

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION

POINT BLANK BODY ARMOR, INC. *

Plaintiff *

v. *

ALLEN PRICE,
JOSEPH KRUMMEL, and
JAMES MURRAY *

Defendants. *

Civil Action No. MJG 01 CV 3256

* * * * *

JOINT REQUEST FOR MODIFICATION OF SCHEDULING ORDER

Plaintiff, Point Blank Body Armor, Inc. and Defendants and Counterclaimants, Allen Price, Joseph Krummel, and James Murray hereby request that the Scheduling Order entered by the Court on November 27, 2001 be modified, and, in connection therewith, state:

1. This matter arises from Plaintiff's claims that the Defendants have misappropriated Plaintiff's trade secrets in violation of the Maryland Uniform Trade Secret Act, Md. Com. Law II Code Ann. §§11-1201 *et seq.* and have breached contracts relating to Plaintiff's confidential information. Defendants have asserted counterclaims for unpaid salary earned while in Plaintiff's employ.

2. The parties commenced discovery in late December 2001 and have continued to work toward its completion. However, due to the other personal and professional commitments of their counsel, and disputes that have arisen regarding the legitimate scope of discovery and the adequacy of certain discovery responses, the parties have not completed discovery and are in agreement that they will not be able to complete discovery prior to April 11, 2002, the present deadline for its completion under the Scheduling Order.

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3. The parties believe that a sixty (60) day extension of the discovery deadline would allow sufficient time to complete the discovery process in an efficient and cost-effective manner.

WHEREFORE, Plaintiff, Point Blank Body Armor, Inc. and Defendants and Counterclaimants, Allen Price, Joseph Krummel, and James Murray hereby request that the Scheduling Order entered by the Court on November 27, 2001 be modified as follows:

Discovery deadline;
submission of status report

June 11, 2002

Requests for admission

June 18, 2002

Dispositive pretrial
Motions deadline

July 18, 2002



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Approved this 4th day of July, 2002



Marvin J. Garbis
United States District Judge